



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Consider)
Refinements to and Further Development of the)
Commission's Resource Adequacy Requirements)
Program.)

R.05-12-013

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
DRAFT DECISION ON REMAINING PHASE 1 ISSUES

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Pursuant to Rule 77.5 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), Southern California Edison Company ("SCE") submits the following reply brief addressing various parties' comments on the Draft Decision on Remaining Phase 1 Issues ("DD").

I.

**THE DD SHOULD NOT PRECLUDE LSEs FROM CONTRACTING FOR THE LOCAL RA
CAPACITY OF A UNIT SEPARATELY FROM ITS SYSTEM RA CAPACITY**

SCE supports the comments of PG&E and SDG&E that express opposition to the DD's express prohibition on the voluntary unbundling and trading of Local and System RA attributes.¹ As all three investor-owned utilities ("IOUs") have indicated, the DD should not foreclose parties from unbundling Local and System RA Capacity, given the separate and distinct compliance requirements that LSEs must meet for Local RA on the one hand and System RA on the other.²

Moreover, as SCE has described, the independent Local and System RA requirements give rise to several practical reasons for allowing LSEs to contract separately for Local RA Capacity and System RA Capacity. For example, the practical benefits include: (1) enabling an LSE to sell only its "long" Local RA Capacity when it has an excess of such capacity, and at the same time acquire more of only the

¹ PG&E Comments at 4; SDG&E Comments at 3-4.

² SCE Comments at 5; PG&E Comments at 4; SDG&E Comments at 4.

System RA Capacity for which it may be “short” in a particular month; and (2) providing LSEs with the ability to balance their portfolios in a more efficient and cost-effective manner for their customers.³

SCE therefore recommends that the Commission lift the DD’s express prohibition of separate contracting for the Local RA Capacity attribute and System RA Capacity attribute of a generating unit, by striking Item #1c from Category 5 of the essential contract elements stated in the DD.

II.

CENTRALIZED REGISTRATION OF RA CAPACITY IS VITAL TO THE INTEGRITY OF THE RA PROGRAM

In its comments, Powerex – noting that the DD states that a need for a title clearinghouse is “unclear” – strongly urges the Commission to give immediate consideration to the issue of preventing overselling the RA qualifying capacity (“QC”) of generation units by permitting the development (by a third party, such as the CAISO) of a “countability mechanism” for RA Capacity.⁴ SCE likewise strongly believes that a registration system for RA Capacity (*i.e.*, title clearinghouse) should be implemented in the near future. An appropriately designed registration system would prevent the overselling of QC by tracking QC title in the system and not allowing a second sale of the same QC to clear the system. Accordingly, a registration system plays a central role in preserving the integrity of the RA program (and reduces administrative burdens on the CAISO and the Commission) by ensuring that QC is fully and accurately accounted for. While SCE does not believe the Commission should endorse a particular RA Capacity registration system at this time (such as the modified Inter-Scheduling Coordinator Energy Trading mechanism recommended by Powerex), the Commission should remain open to endorsing an appropriate registration system once the system has been more fully developed and can be presented and explained to the Commission.

III.

DELIVERABILITY REQUIREMENTS STATED IN THE DD’S ESSENTIAL CONTRACT ELEMENTS SHOULD BE CLARIFIED

In its comments, PG&E recommends that Item #1a of Category 2 in the DD’s essential contract elements be modified to specify that RA Capacity products only need to be deliverable from May through September, rather than “all months of the compliance year.”⁵ SCE agrees that the DD’s statement

³ SCE Comments at 5-6.

⁴ Powerex Comments at 2.

⁵ PG&E Comments at 3.

regarding deliverability requirements should be modified. However, rather than specifying a deliverability period, SCE requests that the DD (at Category 2, Item #1a of the essential contract elements be modified to simply refer to the applicable requirements of the relevant Commission-approved CAISO deliverability study, as follows:

... is deliverable for system RAR ~~for all months of that compliance year~~
in accordance with the applicable Commission-approved CAISO
deliverability study.

IV.

CONCERNS REGARDING THE SCOPE OF REVIEW OF AN RA CAPACITY PRODUCT DEVELOPED BY THE INDUSTRY GROUP ARE MISPLACED

In their joint comments, CMTA and CLECA suggest that use of the advice letter process to seek approval of an RA Capacity product developed by the SCE-led industry group may be too narrow in scope because “there must be broad customer and industry ‘buy-in’ to such a product,” and that there must be assurance that “the language proposed by SCE for *their* standard capacity product will also fit the needs of other market participants.”⁶ These concerns are misguided. First, the SCE-led industry group is developing an RA Capacity product that is not limited to use by SCE. Perhaps more importantly, the product under development is only one version of an RA Capacity product; other parties are not precluded from developing other RA Capacity products. In any case, SCE is certainly willing to work with CMTA and CLECA either inside or outside the industry group regarding their concerns (indeed, the industry group is open to participation by any entity).

The DD would require the IOUs to file by advice letter their RA Capacity products for inclusion in their Commission-approved Procurement Plans.⁷ Although SCE is not opposed to making such a filing, it has pointed out in its opening comments on the DD that because the October 31, 2006 deadline for LSEs to make their year-ahead System and Local RA showings for 2007 is only about three months away, the Commission should at least allow the IOUs to transact in an RA Capacity product that meets the minimum requirements of the final Decision resulting from this DD.⁸ If approval of an advice letter is required, such approval may not be obtained in time to allow transactions for the 2007 year-ahead showings.

⁶ CMTA/CLECA Comments at 3 (emphasis added).

⁷ DD at 28.

⁸ SCE Comments at 4.

V.

COST RECOVERY ISSUES ARE BEYOND THE SCOPE OF THIS PROCEEDING

In its comments, Constellation contends that direct access (“DA”) customers should not be subject to sharing in the costs of any contracts for RA Capacity products entered into by the IOUs with entities that would not otherwise meet the IOUs’ credit standards.⁹ Constellation argues that the full costs of such contracts should be reflected in “generation-related rate elements” avoidable by DA customers.¹⁰ This proposal should not be considered by the Commission at this time because it is outside the scope of this proceeding. Cost recovery issues have not been discussion topics for workshops or briefed at any point in this proceeding, and therefore it would be inappropriate for the Commission to incorporate Constellation’s new proposal into the final Decision.¹¹

In addition, adoption of Constellation’s proposed blanket prohibition on cost sharing for contracts with certain counterparties here would not only be procedurally improper, but also could conflict with principles adopted in the decision regarding cost allocation for new generation procurement (in R.06-02-013), set for Commission consideration on July 20, 2006. The new generation draft decision includes conclusions of law and ordering paragraphs finding that the net costs of long-term new generation contracts entered into pursuant to the decision shall be shared by “all benefiting customers.”¹² To the extent these determinations are retained in the new generation final Decision, DA customers would be obligated to share in the net costs for new generation resources (including RA resources) that meet the Decision’s stated criteria. Constellation’s proposal in this proceeding is entirely inconsistent with the new generation cost sharing principles.

⁹ Constellation Comments at 4. Constellation appears to be concerned that IOUs might contract with non-creditworthy entities in order to meet RAR requirements because the DD does not allow RAR compliance waivers where potential counterparties do not meet LSEs’ credit standards. *Id.*

¹⁰ *Id.*

¹¹ In addition, Constellation repeatedly argues in its comments that the Commission should adopt a monthly compliance filing requirement for Local RAR. *Id.*, at 3-5, 8. The Commission has already adopted a final Decision on Local RAR, D.06-06-064, which declined to include such a requirement. To the extent Constellation seeks to overturn or challenge that determination, it must do so through an Application for Rehearing or Petition for Modification of D.06-06-064, not by seeking to inject its proposal into this DD, which is directed to different issues within the RA program.

¹² Draft Decision of ALJ Brown (“Opinion on New Generation and Long Term Contract Proposals and Cost Allocation”), R.06-02-013, issued June 20, 2006, at Conclusion of Law #4, Ordering Paragraph #1.

VI.

ADDITIONAL ISSUES REQUIRE CLARIFICATION IN PHASE 2

Various parties raise issues in their comments that, while potentially having merit, should be addressed in Phase 2 of this proceeding because there is not an adequate record from Phase 1 to support the proposals advanced by these parties. These issues include:

(1) WPTF's proposal for an alternative approach to QC counting rules for scheduled outages occurring during non-summer months.¹³ SCE agrees with WPTF that LSEs need certainty and additional clarity about the treatment of scheduled outages, with respect to outage requests that are not resolved in sufficient time by CAISO prior to an RA compliance filing. As stated in SCE's opening comments, this issue should be further explored in Phase 2;

(2) CAISO's proposal to include in the DD a specific timetable for LSE's to remedy RAR violations identified by the Energy Division: violations must be corrected no later than 10 days prior to the operative month (consistent with the schedule in CAISO's IRRP Tariff) or the LSE will be subject to a Commission enforcement proceeding.¹⁴ SCE concurs with the comments of DRA that implementation details relating to the Commission's penalty program should be addressed in Phase 2 (including the timetable for remedying violations)¹⁵; and

(3) Calpine's proposal to specify a generator's operational performance obligations for the RA program and the associated enforcement rights in an agreement solely between the generator and the CAISO, and in turn allow the generator to issue a QC certificate to the buyer of RA Capacity in place of stating RA rights in a bilateral contract.¹⁶ This is an entirely new proposal that has not been raised or discussed to date in this proceeding.

VII.

CONCLUSION

For the foregoing reasons, SCE requests that the DD be modified as set forth above and in SCE's Comments dated July 10, 2006.

¹³ WPTF Comments at 3-5.

¹⁴ CAISO Comments at 3-5.

¹⁵ DRA Comments at 2-3. To the extent the Commission is inclined to adopt the CAISO's proposal in the final Decision, SCE requests that the Decision also specify that Energy Division notices triggering the LSEs' remedial obligations must be provided sufficiently in advance of the deadline for correcting the deficiency to enable LSEs to actually make the needed correction.

¹⁶ Calpine Comments at 2-5.

Respectfully submitted,

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July 17, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON DRAFT DECISION ON REMAINING PHASE 1 ISSUES on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.
First class mail will be used if electronic service cannot be effectuated.

Executed this **17th day of July, 2006**, at Rosemead, California.

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